

CASE NUMBER: 034252/2022

## EXHIBIT(S) - C (Motion #001) - Exhibit C - Stipulations

Document prepared for:  
kevin barlow

### CASE NAME

Rosemarie Mckinnis Est Of, Kathleen Mckinniss, Carin  
Rosado, James Finn Est Of, Geraldine Finn Exr v. Ecohealth  
Alliance Inc, Peter Daszak, Janet D Cottingham Aka, Janet  
Dasz...

### CASE FILING DATE

Oct. 5th, 2022

### DOCUMENT FILED DATE

Feb. 21st, 2023

### COUNTY

Rockland county, NY

### JUDGE

Sherri L Eisenpress

### CATEGORY

Torts - Environmental (SARS-COV-2)

### STATUS

Active

# EXHIBIT C

**SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF ROCKLAND****IN RE SARS-CoV-2;**

Index No. 034252/2022

**KATHLEEN MCKINNISS, PROPOSED  
REPRESENTATIVE OF THE ESTATE OF  
ROSEMARIE MCKINNISS, DECEASED; CARIN  
ROSADO, individually; and GERALDINE FINN, AS  
EXECUTOR OF THE ESTATE OF JAMES FINN,  
DECEASED,****STIPULATION  
TO EXTEND TIME****Plaintiffs,****-against-****ECOHEALTH ALLIANCE, INC., PETER DASZAK,  
JANET D. COTTINGHAM a/k/a JANET DASZAK,  
RALPH BARIC, W. IAN LIPKIN, and JOHN  
AND JANE DOES 1-1000,****Defendants.**

**IT IS HEREBY STIPULATED AND AGREED**, by and between the undersigned counsel for Plaintiffs, Kathleen Mckinniss, Proposed Representative of the Estate of Rosemarie Mckinniss, Deceased; Carin Rosado, individually; and Geraldine Finn, as Executor of the Estate of James Finn, Deceased (collectively, "Plaintiffs"), and for Defendants, EcoHealth Alliance, Inc., Peter Daszak, Janet D. Cottingham, a/k/a Janet Daszak, Ralph Baric, and W. Ian Lipkin (collectively, "Defendants"), that the time for Defendants to answer, move or otherwise respond to the Complaint herein is extended to and including December 9, 2022, subject to a further request for an extension of time, if necessary, and Defendants hereby waive any and all defenses in this action based upon alleged improper service of process.

**IT IS FURTHER STIPULATED AND AGREED** that this Stipulation may be executed simultaneously or in one or more counterparts, each of which shall be deemed an original, but all of which together shall constitute one and the same instrument, and any party to

this Stipulation may execute this Stipulation by executing such counterpart. A copy of a party's signature, whether received by e-mail, facsimile, or other means will be deemed original for all purposes.

Dated: October 27, 2022  
Nanuet, NY

Dated: October 27, 2022  
New York, NY

**PATRICIA FINN ATTORNEY, P.C.**  
*Attorneys for Plaintiffs Kathleen Mckinniss, Proposed Representative of the Estate of Rosemarie Mckinniss, Deceased; Carin Rosado, individually; and Geraldine Finn, as Executor of the Estate of James Finn, Deceased*

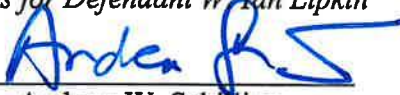
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**TARTER KRINSKY & DROGIN LLP**  
*Attorneys for Defendants EcoHealth Alliance, Inc., Peter Daszak and Janet D. Cottingham, a/k/a Janet Daszak*

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Dated: October 27, 2022  
New York, NY

**BUCKLEY LLP**  
*Attorneys for Defendant W. Ian Lipkin*

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Dated: October 26, 2022  
New York, NY

**GFELLER LAURIE LLP**  
*Attorneys for Defendant Ralph Baric*

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SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF ROCKLAND

IN RE SARS-CoV-2;

Index No. 034252/2022

KATHLEEN MCKINNISS, PROPOSED  
REPRESENTATIVE OF THE ESTATE OF  
ROSEMARIE MCKINNISS, DECEASED; CARIN  
ROSADO, individually; and GERALDINE FINN, AS  
EXECUTOR OF THE ESTATE OF JAMES FINN,  
DECEASED,**STIPULATION  
TO EXTEND TIME**

Plaintiffs,

-against-

ECOHEALTH ALLIANCE, INC., PETER DASZAK,  
JANET D. COTTINGHAM a/k/a JANET DASZAK,  
RALPH BARIC, W. IAN LIPKIN, and JOHN  
AND JANE DOES 1-1000,

Defendants.

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for Plaintiffs, Kathleen Mckinniss, Proposed Representative of the Estate of Rosemarie Mckinniss, Deceased; Carin Rosado, individually; and Geraldine Finn, as Executor of the Estate of James Finn, Deceased (collectively, "Plaintiffs"), and for Defendants, EcoHealth Alliance, Inc., Peter Daszak, Janet D. Cottingham, a/k/a Janet Daszak, Ralph Baric, and W. Ian Lipkin (collectively, "Defendants"), that the time for Defendants to answer, move or otherwise respond to the Complaint herein is extended to and including January 30, 2023, subject to a further request for an extension of time, if necessary, and Defendants hereby waive any and all defenses in this action based upon alleged improper service of process.

IT IS FURTHER STIPULATED AND AGREED that this Stipulation may be executed simultaneously or in one or more counterparts, each of which shall be deemed an original, but all of which together shall constitute one and the same instrument, and any party to this Stipulation

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may execute this Stipulation by executing such counterpart. A copy of a party's signature, whether received by e-mail, facsimile, or other means will be deemed original for all purposes.

Dated: December 7, 2022  
Nanuet, NY

Dated: December 7, 2022  
New York, NY

**PATRICIA FINN ATTORNEY, P.C.**  
*Attorneys for Plaintiffs Kathleen Mckinniss,  
Proposed Representative of the Estate of  
Rosemarie Mckinniss, Deceased; Carin  
Rosado, individually; and Geraldine Finn, as  
Executor of the Estate of James Finn, Deceased*

**TARTER KRINSKY & DROGIN LLP**  
*Attorneys for Defendants EcoHealth Alliance,  
Inc., Peter Daszak and Janet D. Cottingham,  
a/k/a Janet Daszak*

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Dated: December 7, 2022  
New York, NY

Dated: December 7, 2022  
New York, NY

**BUCKLEY LLP**  
*Attorneys for Defendant W. Ian Lipkin*  
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SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF ROCKLAND

.IN RE SARS-CoV-2;

Index No. 034252/2022

KATHLEEN MCKINNISS, PROPOSED  
REPRESENTATIVE OF THE ESTATE OF  
ROSEMARIE MCKINNISS, DECEASED; CARIN  
ROSADO, individually; and GERALDINE FINN, AS  
EXECUTOR OF THE ESTATE OF JAMES FINN,  
DECEASED, DAVID CADD00, EXECUTOR OF  
ESTATE OF PATRICIA MARIE CADD00,  
DECEASED; MELANIE SMITH, EXECUTRIX OF  
ESTATE OF ROBERT SENDZISCHEW, DECEASED;  
KIMBERLY J. LEWIS, EXECUTRIX OF ESTATE OF  
ROBERT F. LEWIS, DECEASED; LISA PETER,  
PROPOSED REPRESENTATIVE OF ESTATE OF  
PATRICIA A. CHISLETT, DECEASED; and  
ROXANNE JONES, PROPOSED REPRESENTATIVE  
OF ESTATE OF DALE JONES, DECEASED

Plaintiffs,

-against-

ECOHEALTH ALLIANCE, INC., PETER DASZAK,  
JANET D. COTTINGHAM a/k/a JANET DASZAK,  
RALPH BARIC, W. IAN LIPKIN, and JOHN  
AND JANE DOES 1-1000,

Defendants.

**STIPULATION  
TO EXTEND TIME**

**IT IS HEREBY STIPULATED AND AGREED**, by and between the undersigned counsel for Plaintiffs, Kathleen Mckinniss, Proposed Representative of the Estate of Rosemarie Mckinniss, Deceased; Carin Rosado, individually; and Geraldine Finn, as Executor of the Estate of James Finn, Deceased; David Caddoo, Executor Of Estate Of Patricia Marie Caddoo, Deceased; Melanie Smith, Executrix of Estate Of Robert Sendzischew, Deceased; Kimberly J. Lewis, Executrix of Estate of Robert F. Lewis, Deceased; Lisa Peter, Proposed Representative of Estate of Patricia A. Chislett, Deceased; and Roxanne Jones, Proposed Representative of Estate of Dale Jones, Deceased (collectively, "Plaintiffs"), and for Defendants, EcoHealth Alliance, Inc., Peter Daszak, Janet



D. Cottingham, a/k/a Janet Daszak, Ralph Baric, and W. Ian Lipkin (collectively, "Defendants"), that the time for Defendants to answer, move or otherwise respond to the Amended Verified Complaint herein, filed January 5, 2023 (NYSCEF Doc. No. 36), is hereby extended to and including February 20, 2023, subject to a further request for an extension of time, if necessary, and Defendants hereby waive any and all defenses in this action based upon alleged improper service of process.

**IT IS FURTHER STIPULATED AND AGREED** that this Stipulation may be executed simultaneously or in one or more counterparts, each of which shall be deemed an original, but all of which together shall constitute one and the same instrument, and any party to this Stipulation may execute this Stipulation by executing such counterpart. A copy of a party's signature, whether received by e-mail, facsimile, or other means will be deemed original for all purposes.

Dated: January 23, 2023  
Nanuet, NY

Dated: January 23, 2023  
New York, NY

**PATRICIA FINN ATTORNEY, P.C.**

*Attorneys for Plaintiffs Kathleen Mckinniss, Proposed Representative of the Estate of Rosemarie Mckinniss, Deceased; Carin Rosado, individually; and Geraldine Finn, as Executor of the Estate of James Finn, Deceased; David Caddoo, Executor Of Estate Of Patricia Marie Caddoo, Deceased; Melanie Smith, Executrix of Estate Of Robert Sendzischew, Deceased; Kimberly J. Lewis, Executrix of Estate of Robert F. Lewis, Deceased; Lisa Peter, Proposed Representative of Estate of Patricia A. Chislett, Deceased; and Roxanne Jones, Proposed Representative of Estate of Dale Jones, Deceased*

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**TARTER KRINSKY & DROGIN LLP**

*Attorneys for Defendants EcoHealth Alliance, Inc., Peter Daszak and Janet D. Cottingham, a/k/a Janet Daszak*

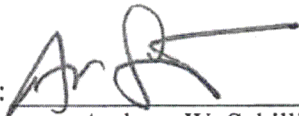
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Dated: January 23, 2023  
New York, NY

**BUCKLEY LLP**

*Attorneys for Defendant W. Ian Lipkin*

By: 

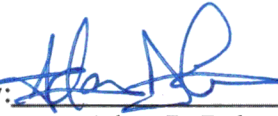
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Dated: January 23, 2023  
New York, NY

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